

**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

| | | |
|-------------------------|---|-------------------|
| TECHNO LICENSING, LLC |) | |
| |) | |
| Plaintiff, |) | |
| |) | No. 1:18-cv-06505 |
| v. |) | |
| |) | |
| DILLON KANE GROUP, LLC, |) | |
| |) | |
| Defendant. |) | |

**DEFENDANT’S MOTION FOR EXTENSION
OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Dillon Kane Group, LLC (“Dillon Kane”), through its undersigned counsel and pursuant to Federal Rule of Civil Procedure 6(b), moves this Court for an extension of time of sixty (60) days, to December 24, 2018, to file a response to Plaintiff’s Complaint. In support of its motion, Dillon Kane states as follows:

1. On September 25, 2018, Plaintiff Techno Licensing, LLC filed its Complaint seeking an injunction and damages for alleged patent infringement. (*See* Doc. #1.)
2. On October 3, 2018, Dillon Kane was served with a copy of the Summons and Complaint. Pursuant to Federal Rule of Civil Procedure 12(a)(1)(A)(i), Dillon Kane’s responsive pleading is due on October 24, 2018.
3. On October 17, 2018, Dillon Kane retained Andrew J. Greene and Arthur M. Scheller III of ASG Law LLC to represent it in this case.
4. Plaintiff’s Complaint alleges infringement of a patent entitled “Communication Method and Communication Equipment in the PoC Service” (the ‘011 Patent”). The ‘011 Patent implicates technology for controlling a communication relay. Plaintiff alleges that Dillon Kane sells, offers to sell, and/or uses push-to-talk over cellular (PoC) platforms, including the Instant

Connect communications platform, which allegedly infringe the '011 Patent. The underlying facts of this case are complex and highly technical. Undersigned counsel has just been retained and started investigating the facts and defenses pertaining to the claimed patent infringement.

5. Accordingly, Defendant Dillon Kane seeks an extension of sixty (60) days, until December 24, 2018, to file its responsive pleading. This extension will allow Dillon Kane to investigate Plaintiff's allegations and will not unreasonably delay the progress of this matter.

WHEREFORE Defendant Dillon Kane Group, LLC respectfully requests that this Motion be granted, and that an order be entered granting it an extension of sixty (60) days, until December 24, 2018, to file a responsive pleading to Plaintiff Techno Licensing, LLC's Complaint.

Dated: October 18, 2018

Respectfully submitted,

DILLON KANE GROUP, LLC

By: /s/Arthur M. Scheller III
One of its attorneys

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CERTIFICATE OF SERVICE

The undersigned certifies that on October 18, 2018, I electronically transmitted the foregoing **Defendant's Motion for Extension of Time to Answer or Otherwise Plead** to the Clerk of the Court using the CM/ECF System for filing and transmittal to the CM/ECF registrants.

/s/Arthur M. Scheller III